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January 12, 2024

VIA EMAIL AND ECF

The Honorable Kenneth M. Karas  
United States District Court Judge  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601

Re: *United States v. Jakeem Sylvester*, 22-cr-17-1 (KMK)

Dear Honorable Judge Karas:

I write to respectfully request Your Honor amend Mr. Sylvester's release conditions to permit him to attend a memorial on January 17, 2024 to commemorate the anniversary of his mother, Monica Sylvester's, passing. His family is planning to gather at his father's house in Poughkeepsie, New York, from 1 p.m. to 5 p.m. with a balloon release on the Hudson River at 5:30 p.m. and dinner to follow. It is anticipated that the entire event would conclude at 7:30 p.m. In addition, if the Court were to permit Mr. Sylvester to attend this event, he would require time to travel from the Albany area to Poughkeepsie and back.

As Your Honor likely recalls, Mr. Sylvester's mother was battling stage 4 lung cancer and residing in South Carolina at the time of his sentencing on October 5, 2022. She submitted a letter of support on his behalf at the time of sentencing, which was attached to my sentencing letter as Exhibit B. A copy of that letter, dated September 6, 2022, is attached to this request. Ultimately, his mother succumbed to lung cancer on January 17, 2023. *See* Obituary of Monica Sylvester, attached hereto. Mr. Sylvester was in custody at the time of her passing and did not have an opportunity to attend her funeral or grieve with his family. His hope was to attend all or some portion of this event in order to mourn with his family.

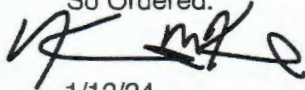
I have communicated with Pre-Trial Services Officer Shannon Finneran who defers to the Court regarding this request. I have communicated with the government through Ms. Ong, who objects to this request based on the reasons stated at the bail hearings.

Although it is Mr. Sylvester's wish to attend the entirety of the events to commemorate his mother, he appreciates that the Court may have reservations regarding the length of time requested. If Your Honor does not feel that he should attend the entire event, then he would request the opportunity to at least attend a portion of the event, such as part of the gathering at his father's house and the balloon release.

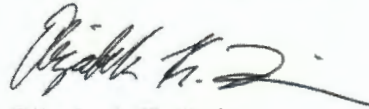
Therefore, I am requesting that Mr. Sylvester's request to attend his mother's memorial service be granted in whole or in part. Thank you for your time and consideration.

Mr. Sylvester may attend his mother's memorial service in whole.

So Ordered.

  
1/12/24

Respectfully submitted,



Elizabeth K. Quinn  
Assistant Federal Defenders  
Attorneys for Jakeem Sylvester

cc: Jennifer Ong, AUSA  
Shannon Finneran, PTS